



State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
CN 028
Trenton, NJ 08625-0028

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Commissioner

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Jonathan Josephs
New Jersey Superfund Branch II
Emergency and Remedial Response Division
USEPA, Region II
Jacob K. Javits Federal Building
New York, NY 10278

29 SEP 1992

Re: L. E. Carpenter Site
Wharton Borough, Morris County
Revised Feasibility Study

The New Jersey Department of Environmental Protection and Energy reviewed your comments dated September 14, 1992, regarding the above referenced site. Most comments were forwarded to L. E. Carpenter, however, some were omitted. The following is a discussion of the reasons why some comments were not forwarded.

I. Enclosure 1 - August 28, 1992 memo from William Lawler of EPA's Environmental Impacts Branch.

The wetlands comment was not included for more specific comments were communicated to me by phone on September 11, 1992 by Susan Osofsky, USEPA. See attached letter dated September 16, 1992 from NJDEPE to L. E. Carpenter regarding the Wetlands Assessment

II. Enclosure 2 - The September 1, 1992 memo from Andrew Bellina of EPA's Hazardous Waste Facilities Branch

All comments were included and OSWER directive was forwarded.

III. Enclosure 3 - The September 1, 1992 memo from Peter Belmonte of EPA's Air Programs Branch.

Comment (2) does not apply at this stage of the investigation. VOC emissions and ambient air concentrations at nearby receptors will be determined during the design stage of the investigation. The potential ARARs memo was forwarded.



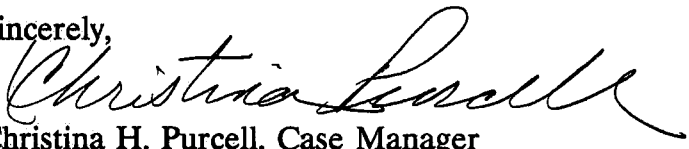
- IV. Enclosure 4 - The September 10, 1992 memo from Dore LaPosta of EPA's Drinking/Ground Water Protection Branch
- A. Comment (2) was not included because the Department feels that the intermediate wells, specifically MW-11i and MW-12i are screened in this zone in the area of maximal shallow zone contaminant detections . Also, bis-2-ethyl hexyl phthalate (DEHP) and other contaminants of concern are not denser than water or a dense non-aqueous phase liquid (DNAPL) as the memo iterates. DEHP, ethylbenzene and xylene are considered to be "floaters".
 - B. As in comment (A), the Department feels that screen length of the deep wells are adequate in the "maximal shallow zone" area. As stated above, the contaminants of concern are not considered to be DNAPLs. Additionally, water levels measurements have historically indicated upward heads which would make contaminant migration down to the bedrock aquifer unlikely. However, the deep wells will be sampled in the future and possibly an additional deep well will be installed down gradient of MW-11d.
 - C. The screen length of MW-5 is 30 feet not 70 feet. The wells MW-1 through MW-10 were installed prior to this case becoming a CERCLA site and therefore did not need to follow the EPA Region II CERCLA QA manual. The groundwater samples from most of these wells have shown the groundwater to be contaminated at very high levels and therefore, the Department feels that the screen lengths are not interfering with quality of data at this time. The sampling results of MW-5 have not detected any contamination and is no longer monitored in the quarterly sampling rounds (has been replaced by MW-15s).
 - D. The Department has reviewed this issue many times and has determined that there is a likelihood that a clay layer does exist in the area of MW-14. There was evidence of clay in the some test pits completed near the MW-14 cluster. Additionally, the drilling log for the MW-14 cluster has been questioned by the Department because of the drilling method which was used.
 - E. The Department has not determined the relevance of this comment and requests further explanation.
 - F. Comment included in letter to L. E. Carpenter.
 - G. Ground water modeling will be expanded upon during the design phase of the investigation.
 - H. The comment does not have any relevance to the FS Report.

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- I. Pulse pumping is being utilized for present product removal.
- J. See comment B.
- K. Treatability Study Report will be forwarded in its second revision.
- L. Comment included in letter to L. E. Carpenter.

Should you have any questions regarding this letter, please feel free to contact me at (609) 633-1455. Thank you for your continuing cooperation.

Sincerely,



Christina H. Purcell, Case Manager
Bureau of Federal Case Management

cc: John Prendergast, BEERA
George Blyskun, BGWPA